



UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF CALIFORNIA

'08 MJ 8059

UNITED STATES OF AMERICA,

Plaintiff,

v.

Maria Teresita MADRID Hernandez

Defendant.

} Magistrate Case No.:

} COMPLAINT FOR VIOLATION OF

} 21 U.S.C. § 952 and 960
Importation of a Controlled Substance
(Felony)

The undersigned complainant being duly sworn states:

That on or about January 23, 2008, within the Southern District of California, defendant Maria Teresita MADRID-Hernandez did knowingly and intentionally import approximately 17.20 kilograms (37.84 pounds) of cocaine a Schedule II Controlled Substance, into the United States from a place outside thereof, in violation of Title 21, United States Code, Sections 952 and 960.

The complainant states that this complaint is based on the attached Statement of Facts incorporated herein by reference.

BRANDON M. WOOD
Special Agent
U.S. Immigration & Customs
Enforcement

SWORN TO BEFORE ME AND SUBSCRIBED IN MY PRESENCE, THIS 24th,
DAY OF JANUARY 2008.

PETER C. LEWIS
UNITED STATES MAGISTRATE JUDGE

1 UNITED STATES OF AMERICA

2 V.

3 Maria Teresita MADRID Hernandez

4 STATEMENT OF FACTS

5 This Statement of Facts is based on the reports, documents, and notes
6 furnished to U. S. Immigration and Customs Enforcement Special Agent B. Wood.

7 On January 23, 2008 at approximately 1010 hours, Maria Teresita MADRID-
8 Hernandez entered the United States at the Calexico, California, West Port of Entry.
9 MADRID was the sole occupant driver and registered owner of a 2004 Chevy Vectra.

10 CBP Officer C. Randolph's canine alerted to the dash area of MADRID's vehicle
11 in a pre-primary search. MADRID proceeded to primary inspection and gave Customs
12 and Border Protection Officer (CBPO) C. Morse a negative oral Customs declaration.
13 MADRID and the vehicle were referred to the secondary lot for closer examination.

14 In the vehicle secondary lot, CBPO A. Zuniga discovered 15 packages inside the
15 firewall area of the vehicle. One of the packages was probed and a sample of a white
16 powdery substance was obtained, which field tested positive for cocaine. The 15
17 packages had a combined net weight of approximately 17.20 kilograms (37.84 pounds).

18 MADRID was placed under arrest and advised of her Constitutional Rights,
19 which she acknowledged and waived, agreeing to answer questions. MADRID stated to
20 Special Agent Wood that she was going to be paid \$2,000.00 to smuggle cocaine into
21 the United States.

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